

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

DOUG LANEY, et al.

Plaintiffs,

vs.

**CLEMENTS FLUIDS MANAGEMENT,
LLC., et al.**

Defendants.

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Civil Action No. 6:18-cv-00497

NOTICE OF SETTLEMENT

Plaintiff/Opt-Ins Doug Laney, Sydney B Hamblin, Bryan McKnight and Albert Villalobos, and Defendants Clements Fluids Management, LLC, Clements Fluids South Texas, Ltd., and Clements Fluids Henderson, Ltd. respectfully file and submit this, their Notice of Settlement as follows:

Plaintiff/Opt-Ins and Defendants have agreed upon an amicable resolution amongst themselves as well as by and through their counsel of record. In exchange for the receipt by the Plaintiff/Opt-Ins as well as their attorneys of record, of the total amount of \$25,000.00, the foregoing have agreed and will execute an appropriate Settlement Agreement and Release by which the Defendants are released from any and all liability, including attorneys' fees and court costs.¹ Accordingly, the controversy existing with respect to the above-referenced and numbered cause no longer exists and the issues requiring resolution are now moot. Counsel for Plaintiff/Opt-

¹ The settlement amount involved suggests and evidences the fact that this is a nuisance value settlement, by definition. The Defendants have steadfastly and consistently denied any and all liability to the referenced Plaintiff/Opt-Ins.

Ins and Defendants shall submit an Agreed Motion to Dismiss and proposed Agreed Order of Dismissal to this Honorable Court immediately upon the consummation of the settlement.

For these reasons, Opt-In/Plaintiffs and Defendants request that this Honorable Court terminate and cancel any and all proceedings presently occurring or scheduled to occur with respect to the above-referenced and numbered cause pending the consummation of a settlement, whereupon an Agreed Motion to Dismiss and proposed Agreed Order of Dismissal shall be presented to the Court.

Dated: April 8, 2020

Respectfully Submitted,

MUNSCH, HARDT, KOPF & HARR, P.C.

By: /s/ Daniel D. Pipitone

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on April 8, 2020.

/s/ Daniel D. Pipitone

DANIEL D. PIPITONE